

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Haliron Power, LLC,

Plaintiff,

vs.

Civil Action No.: 6-18-cv-02911-TMC

Fluor Daniel Caribbean, Inc., a subsidiary of
Fluor Enterprises, Inc., Zurich American
Insurance Company, Federal Insurance
Company, Travelers Casualty and Surety
Company, Fidelity and Deposit Company of
Maryland, and Liberty Mutual Insurance
Company,

Defendants.

NOTICE OF REQUEST FOR PROTECTION

Pursuant to Local Rule 6.02, N. Ward Lambert, counsel for the Defendants, Fluor Daniel Caribbean, Inc., a subsidiary of Fluor Enterprises, Inc., Zurich American Insurance Company, Federal Insurance Company, Travelers Casualty and Surety Company, Fidelity and Deposit Company of Maryland, and Liberty Mutual Insurance Company, respectfully requests this Honorable Court's protection from being called to hearings or other Court appearances in this case from June 24 – June 28, 2019, as counsel has a family vacation scheduled.

Respectfully submitted,

s/N. Ward Lambert

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and Liberty Mutual Insurance Company*

April 15, 2019
Greenville, South Carolina